

Noel H. Johnson (Wis. Bar No. 1068004)  
(*Pro hac vice*)

Joseph A. Vanderhulst (Ind. Bar No. 28106-02)  
(*Pro hac vice*)

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*Counsel for Defendant-Intervenor Public Interest Legal Foundation*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

NORA LUNA; BILAL SHABAZZ; DIANE  
CRUMP-RICHMOND; SUSAN FLORIAN;  
and DEMI FALCON,

Plaintiffs,

v.

BARBARA CEGAVSKE, in her official  
capacity as the Nevada Secretary of State; and  
JOSEPH GLORIA, in his official capacity as  
the Clark County Registrar of Voters,

Defendants,

PUBLIC INTEREST LEGAL FOUNDATION,

Defendant-Intervenor.

No. 2:17-cv-02666-JCM-GWF

**MOTION TO WITHDRAW AS  
COUNSEL OF RECORD**

Joseph A. Vanderhulst, who has appeared in this proceeding as counsel for Defendant-Intervenor Public Interest Legal Foundation (the “Foundation”), respectfully moves this Court for an order permitting Mr. Vanderhulst to withdraw as counsel for the Foundation, in the above captioned matter. In support of this motion, Mr. Vanderhulst states the following:

1. On November 17, 2017, this Court granted Mr. Vanderhulst’s Verified Petition to Practice Pro Hac Vice. ECF No. 40 (Nov. 17, 2017).

2. Local Rule IA 11-6(b) provides, “No attorney may withdraw after appearing in a case except by leave of the court after notice has been served on the affected client and opposing counsel.”

3. The Foundation has received notice of Mr. Vanderhulst’s intent to withdraw from this case.

4. Opposing counsel will receive notice of this Motion to Withdraw as Counsel of Record via the CM/ECF system.

5. Local Rule IA 11-6(e) provides, “[N]o withdrawal or substitution will be approved if it will result in delay of discovery, the trial, or any hearing in the case.” No delay of any kind will result from Mr. Vanderhulst’s withdrawal because the Foundation is represented by counsel who have previously appeared in this proceeding.

For these reasons, Mr. Vanderhulst respectfully moves this Court for an order permitting Mr. Vanderhulst to withdraw as counsel for the Foundation, in the above captioned matter.

Dated: January 3, 2019

Respectfully submitted,

/s/ Joseph A. Vanderhulst  
Joseph A. Vanderhulst  
Public Interest Legal Foundation  
32 E. Washington St., Ste. 2675  
Indianapolis, IN 46204

1 IT IS SO ORDERED.

2 Dated: January 7, 2019

3 By: George Foley Jr.  
4 UNITED STATES MAGISTRATE JUDGE  
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